

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GSE BONDS ANTITRUST
LITIGATION

Case No. 1:19-cv-01704 (JSR)

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
STIPULATION AND AGREEMENT OF SETTLEMENT WITH
BNP PARIBAS SECURITIES CORP.; CANTOR FITZGERALD & CO.; CITIGROUP
GLOBAL MARKETS INC.; CREDIT SUISSE SECURITIES (USA) LLC; HSBC
SECURITIES (USA) INC.; J.P. MORGAN SECURITIES LLC; MERRILL LYNCH,
PIERCE, FENNER & SMITH INC.; MORGAN STANLEY & CO., LLC; NOMURA
SECURITIES INTERNATIONAL, INC.; SG AMERICAS SECURITIES LLC;
TD SECURITIES (USA) LLC; AND UBS SECURITIES LLC**

PLEASE TAKE NOTICE that Plaintiffs Joseph M. Torsella, in his official capacity as the Treasurer of the Commonwealth of Pennsylvania and statutory custodian of all Commonwealth Funds; City of Birmingham Retirement and Relief System; Electrical Workers Pension Fund Local 103, I.B.E.W.; and Local 103, I.B.E.W. Health Benefit Plan ("Plaintiffs") will, and hereby do, move the Court pursuant to Fed. R. Civ. P. 23(e) for an order:

- (1) preliminarily approving the proposed settlement with BNP Paribas Securities Corp.; Cantor Fitzgerald & Co.; Citigroup Global Markets Inc.; Credit Suisse Securities (USA) LLC; HSBC Securities (USA) Inc.; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Inc.; Morgan Stanley & Co., LLC; Nomura Securities International, Inc.; SG Americas Securities LLC; TD Securities (USA) LLC; and UBS Securities LLC;
- (2) approving Huntington National Bank as Escrow Agent;
- (3) approving A.B. Data, Ltd. as Claims Administrator;
- (4) approving proposed forms of notice to the proposed settlement class; and
- (5) authorizing notice as provided in the Order.

Submitted herewith in support of this Motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motions for Preliminary Approval; and

(2) Declaration of Christopher M. Burke in Support of Plaintiffs' Motions for Preliminary Approval.

Dated: December 16, 2019

s/ Christopher M. Burke
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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Christopher M. Burke

Christopher M. Burke